

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Harry M. Scignoli, Jr.	:	Case No.: 18-18285-amc
	:	
Debtor	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Harry M. Scignoli, Jr., by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about December 18, 2018.
2. The Chapter 13 filing was assigned case number 18-18285.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about May 29, 2019.
4. On or about October 19, 2020 the Debtor and Wilmington Savings Fund Society, et. al, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the Stipulation, the Debtor is delinquent in the sum of \$4,368.85 in post-petition payments. A true and correct copy of the Stipulation is attached hereto as **Exhibit "A."**
6. In accordance with the Stipulation, the Debtor will cure the subject \$4,368.85 by amending the Chapter 13 plan.
7. In furtherance of the Stipulation and the Debtor curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit B**", is affordable to the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: October 27, 2020

/s/Brad J. Sadek, Esq
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